



Arizona Farm Bureau Federation

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Gilbert, AZ 85296

August 20, 2020

Director Tom Buschatzke
C/O Sharon Scantlebury
Docket Supervisor
Arizona Department of Water Resources
P.O. Box 36020
Phoenix, AZ 85006-6020

Re: Proposed Fourth Management Plan for the Pinal AMA

Dear Director Buschatzke,

On behalf of more than 2,500 farm and ranch members across our state, the Arizona Farm Bureau appreciates the opportunity to provide input on the proposed Fourth Management Plan for the Pinal AMA.

The Pinal AMA contains a significant amount of agricultural acreage that relies on groundwater to produce nutritious and affordable food for Arizona's families. Since the Groundwater Management Act of 1980 (GMA) was adopted, our farmers have made great strides toward reducing groundwater use and implementation of best management practices. Any changes to the management plans that will require more robust conservation requirements are therefore reviewed to determine whether they are consistent with these practices, which have made our farms more efficient than ever before.

Planning Process

As an overarching concern, we have significant misgivings about the process through which the Fourth Management Plan was developed. Rather than undertaking a collaborative effort with the stakeholders and relevant water users, the Department drafted this plan independently. We recognize that this was due to time constraints and pressure placed on the Department to adopt a new plan in accordance with the GMA, but the fact remains that this plan was developed in a manner that only sought stakeholder input after it was largely complete. As a result, several of its provisions, especially as they relate to agricultural water use, do not comport with effective water management practices.

This is especially concerning given the fact that the Fourth Plan will serve as the baseline for the Fifth Plan, because the GMA requires that each successive plan be more rigorous than the plan before. While we appreciate the robust stakeholder process the Department has initiated for development of the Fifth Management Plan, we are concerned that the starting point for that stakeholder process will be faulty if

the Fourth Management Plan goes forward as-is. Therefore, we recommend that ADWR re-adopt the Third Plan until such a time as a collaborative stakeholder process can convene.

Specific Concerns

In absence of such an approach, there are several provisions in the Fourth Plan that need to be revised to better reflect effective management of ag water:

- **Agricultural Base Program, 4.3.1: Reduction of Highest Water Duties by 25 Percent**
Although the GMA allows such a reduction of water duties, this percent is a largely arbitrary number that has no basis in conservation science. Moreover, many of the highest water duty holders have a high water duty because it is necessary for leaching of salts out of poor quality soils. Reducing this duty would severely limit a farmer's ability to implement this practice and would result in severely depleted soil quality and production capability.
- **Agricultural BMP Program, 4.3.3**
Increasing the BMP target to 12 points, while a logical way to increase adoption of Best Management Practices, is once again a largely arbitrary target. In the absence of justification for the increase, we respectfully ask that this target be removed unless and until there is empirical data to support it.
- **Agricultural Irrigation Districts, 4.4**
Requiring all irrigation districts to line canals regardless of the amount of water delivered to agriculture may pose a significant financial burden on smaller districts.

Pinal AMA Management Goal & Agricultural Demand

In addition to the specific concerns outlined above, we also highlight two general themes running through the Fourth Management Plan document that are potentially problematic. The unique goal of the Pinal AMA is to preserve the agricultural economy for "as long as feasible" while recognizing the need to protect water supplies for non-irrigation uses. We recognize and appreciate the difficulty of managing water in a way that upholds both of those goals, but we are concerned that the Fourth Management Plan treats preserving non-agricultural uses as its primary objective.¹ We believe this runs contrary to the statutory language and intention of the GMA.

Moreover, the introductory language in Section 4 goes into great detail regarding agricultural demand for water, including the relative effectiveness of the BMP Program when compared to the Base Program. This comparison fails to recognize the differences between cropland enrolled in the BMP Program and cropland enrolled in the Base Program, including the extent to which BMP-enrolled acres have relied on Flex Credits. We recommend that ADWR examine whether the conclusions drawn in the Fourth Management Plan document are indeed accurate, and recommend they be excluded from the document until that analysis is complete.

¹ For example, section 11.1 of the plan begins with the following introduction: "The goal of the PAMA *recognizes* the reality of continued groundwater use for agricultural purposes, while working toward *achieving* the second portion of the PAMA goal: to preserve future water supplies for non-irrigation uses." (Emphasis added.)

The Maricopa-Stanfield Irrigation and Drainage District and the Central Arizona Irrigation and Drainage District have both submitted comments addressing these same issues. We support those comments and incorporate them herein.²

The Arizona Farm Bureau and ADWR are united in our efforts to make sure that all Arizona, including agriculture, has a reliable, secure water supply. We look forward to continuing the conversation regarding the Fourth (and Fifth) Management Plan and appreciate your consideration of our comments today.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse".

Stefanie Smallhouse, President
Arizona Farm Bureau Federation

² MSIDD Comment Letter, June 5, 2020:

<https://new.azwater.gov/sites/default/files/media/MSIDD%20Comments.pdf>

CAIDD Comment Letter, June 5, 2020:

https://new.azwater.gov/sites/default/files/media/CAIDD_7.pdf